

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CEOLA WILLIAMS AND NICOLE CHAN,

Plaintiffs,

**Case No.: 20-CV-09871-AJN**

- against -

GLOBAL SECURITY SOLUTIONS, INC, AND  
NEIGHBORHOOD ASSOCIATION FOR INTER-  
CULTURAL AFFAIRS, INC, A/K/A N.A.I.C.A.,  
INC.,

Defendants.

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**GLOBAL SECURITY SOLUTIONS, INC.'S ANSWER TO CROSSCLAIMS**

**INTERPOSED BY N.A.I.C.A.**

Defendant, GLOBAL SECURITY SOLUTIONS, INC. by and through their its attorneys, Law Office of Terrence J. Worms, P.C., as and for their Answer to the DEFENDANT N.A.I.C.A.'s cross-claims, state upon information and belief as follows:

1. DEFENDANT GLOBAL is without knowledge or information sufficient to form a belief as to the allegations contained in paragraph 1 of DEFENDANT NAICA's Cross-Claim Complaint and leave them to their proof.
2. DEFENDANT GLOBAL admits the allegations contained in paragraph 2 of DEFENDANT NAICA's Cross-Claim Complaint.

3. DEFENDANT GLOBAL denies the allegations contained in paragraph 3 of DEFENDANT NAICA's Cross-Claim Complaint.

4. DEFENDANT GLOBAL admits to the allegations contained in paragraph 4 of DEFENDANT NAICA's Cross-Claim Complaint.

5. DEFENDANT GLOBAL admits to the allegations contained in paragraph 5 of DEFENDANT NAICA's Cross-Claim Complaint.

6. DEFENDANT GLOBAL admits the allegations contained in paragraph 6 of DEFENDANT NAICA's Cross-Claim Complaint.

7. DEFENDANT GLOBAL admits the allegations contained in paragraph 7 of DEFENDANT NAICA's Cross-Claim Complaint.

**COUNT I**

**(Contribution)**

8. DEFENDANT GLOBAL denies the allegations contained in paragraph 8 of DEFENDANT NAICA's Cross-Claim Complaint.

**AS AND FOR THE FIRST AFFIRMATIVE DEFENSE**

9. DEFENDANT NAICA has failed to state a claim upon which relief may be granted as DEFENDANT NAICA's cross-claim is inconsistent with their affirmative defenses in that the claim that DEFENDANT NAICA alleges there is no special relationship but has filed a pro-forma claim alleging a special relationship.

**AS AND FOR THE SECOND AFFIRMATIVE DEFENSE**

10. DEFENDANT NAICA has exclusive dominion and control over the employees the subject location including the perpetrator "Nelson" and could hire and fire guards at will pursuant to the contract between DEFENDANT GLOBAL and DEFENDANT NAICA.

**AS AND FOR THE THIRD AFFIRMATIVE DEFENSE**

11. DEFENDANT GLOBAL took reasonable steps to prevent and promptly correct sexual harassment in the workplace caused by DEFENDANT NAICA's employee.

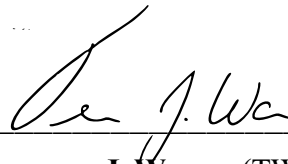
**WHEREFORE**, the Defendant, GLOBAL SECURITY SYSTEMS, INC., respectfully requests that the Court enter an Order:

- a) Dismissing DEFENDANT NAICA'S Cross-Claim Complaint against DEFENDANT GLOBAL with prejudice;
- b) Awarding Defendant Global the costs and disbursements of this action, including attorney's fees; and
- c) Awarding Defendants such other and any further relief as the Court may deem just and proper.

Dated: Flushing, New York  
April 28, 2021

**Law Office of Terrence J. Worms, P.C.**  
Attorneys for Defendant:  
➤ *Global Security Solutions, Inc*

By



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